

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE: LESLEY WELLS
)	MAGISTRATE JUDGE: GREG WHITE
)	
-vs.-)	<u>STIPULATED MOTION OF PLAINTIFF</u>
)	<u>HODELL-NATCO INDUSTRIES, INC.</u>
)	<u>FOR AN EXTENSION TO RESPOND TO</u>
SAP AMERICA, INC., et al.)	<u>MOTION TO DISMISS FILED BY</u>
)	<u>DEFENDANTS SAP AMERICA, INC.</u>
Defendants.)	<u>AND SAP A.G.</u>

Plaintiff Hodell-Natco Industries, Inc. (“Hodell-Natco”), by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 6(b), submits the following Motion moving this Honorable Court for an Order granting Hodell-Natco an extension in which to oppose the Motion to Dismiss (ECF #36) filed by defendants SAP America, Inc. and SAP A.G. on June 1, 2009. Hodell-Natco requests an extension until July 30, 2009 in which to oppose that Motion.

Counsel for Hodell-Natco has conferred with counsel for the SAP defendants, who has indicated that he consents to the requested extension until July 30, 2009. Counsel for Hodell-Natco submits that the requested extension is justified so that counsel may adequately address the arguments contained within defendants’ Motion. This motion is not being interposed for purposes of delay and will not prejudice any party.

Accordingly, based upon the foregoing, Hodell-Natco requests an extension until July 30, 2009 in which to oppose defendants’ Motion to Dismiss.

Respectfully submitted,

/s/ P. Wesley Lambert

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OF COUNSEL:

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Attorneys for defendant,

Hodell-Natco Industries, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of June, 2009, a copy of the foregoing Stipulated Motion of Plaintiff Hodell-Natco Industries, Inc. for an Extension to Respond to Motion to Dismiss Filed by Defendants SAP America, Inc. and SAP A.G. was filed electronically. Parties may access this filing through the Court's electronic filing system.

/s/ P. Wesley Lambert

P. WESLEY LAMBERT (0076961)

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